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June 19, 2024

Via Electronic Filing

The Hon. Cheryl L. Pollak, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Kociubinski v. NYC Health and Hospital Corp.*
Case No.: 1:22-cv-02865-ENV-CLP

Dear Honorable Judge Pollak:

This law firm represents Plaintiffs Renata Kociubinski, Penina Ben-Yosef, Yelena Mitrofanova and Jawwad Butt (collectively, the “Plaintiffs”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives in Your Honor’s June 17, 2024 Status Report Order, this joint letter respectfully serves to provide the Court with a status update in the above-referenced matter.

Plaintiffs respectfully request that the Court So-Order the following deposition schedule:

1. Leonid Mericov – July 8, 2024 beginning at 10:00 a.m.;
2. Patricia Copes – July 9, 2024 beginning at 10:00 a.m.;
3. Elena Auxton – July 10, 2024 beginning at 10:00 a.m.;
4. Darren Collington – July 11, 2024 beginning at 10:00 a.m.; and
5. Toni Louis – July 15, 2024 beginning at 10:00 a.m.

The depositions will be conducted in-person, at Plaintiffs’ counsel’s offices:

Levin-Epstein & Associates, P.C.
60 East 42nd Street, Suite 4700
New York, NY 10165

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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